

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JACQUELINE LASSITER,

Plaintiff,

v.

CA No. 04-10550-WGY

KIMBER ANDERSON, ET AL.,

Defendants.

DEFENDANTS' RULE 26(a)(3) DISCLOSURE

Pursuant to Fed.R.Civ.P. 26(a)(3), Defendants Fleet National Bank ("Fleet"), Brian Gibbs ("Gibbs") and Kimber Anderson ("Anderson") make the following disclosures.

A. Defendants' Proposed Witnesses

Jacqueline Lassiter-Plaintiff

Brian Gibbs-Defendant

Kimber Anderson-Defendant

Jane Gervais-Defendant Fleet National Bank representative

C/o Siobhan Sweeney, Esq.

Edwards & Angell, LLP

101 Federal Street

Boston, MA 02110

Stacey Micka

9 Rivermeadow Rd.

Chelmsford, MA 01824

Tel: 978-256-7174

Defendants expect to call each of these witnesses. Defendants reserve the right to amend and supplement this list.

B. Witnesses by Deposition

Defendant does not anticipate that any witnesses will testify by deposition.

C. Defendants' Proposed Exhibits

Defendant expects to offer the following exhibits

1. Lassiter Dep. Exhibit 1—Tellers O&S
2. Lassiter Dep. Exhibit 2—Time Sheets
3. Lassiter Dep. Exhibit 3—Branch Performance Standard Guidelines
4. Lassiter Dep. Exhibit 6—Formal Counsel-Written
5. Lassiter Dep. Exhibit 7—Formal Counsel/Written-Performance
6. Lassiter Dep. Exhibit 8—January 22, 2002 letter
7. Lassiter Dep. Exhibit 9—3/23/02 letter
8. Lassiter Dep. Exhibit 11—Development Action Plan
9. Lassiter Dep. Exhibit 12—Final Counsel-Performance
10. Lassiter Dep. Exhibit 13—4/13/02 letter
11. Lassiter Dep. Exhibit 14—April 10, 2002 letter
12. Lassiter Dep. Exhibit 15—Working At Fleet
13. Lassiter Dep. Exhibit 18—IRS Form 1040 for 2002
14. Lassiter Dep. Exhibit 19—IRS Form 1040 for 2003
15. LAS-0020—Official Check and Money Order
16. LAS-0022—teller tape 4/8/02
17. LAS-0016—Fleet Memorandum 2/1/02
18. Plaintiff's resume from on or around 4/24/02, which was produced by Fleet during MCAD discovery process.

Defendants reserve the right to amend and supplement this exhibit list.

FLEET NATIONAL BANK, BRIAN
GIBBS AND KIMBER ANDERSON,
DEFENDANTS
By their attorneys,

/s/ Siobhan M. Sweeney
George P. Kostakos (BBO# 557919)
Edwards & Angell, LLP
2800 Financial Plaza
Providence, RI 02903
(401) 528-5864
(401) 528-5859 (fax)

Siobhan M. Sweeney (BBO # 562118)
Edwards & Angell, LLP
101 Federal Street
Boston, MA 02210

(617) 439-4444

(617) 439-4170 (fax)